

THE  
**COMPLIANCE**  
GROUP

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February 8, 2012

Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
445 12th Street, S.W.  
Washington, DC 20554

Re: **Compass Global**  
CPNI Certification Pursuant to 47 C.F.R. § 64.2009(e)  
EB Docket No. 06-36

Dear Ms. Dortch:

On behalf of Compass Global ("Compass Global"), enclosed herewith please find the company's Annual Customer Proprietary Network Information Certification ("CPNI Officer Certification") covering 2011.

Should you have any questions regarding this filing, please do not hesitate to contact the undersigned.

Respectfully submitted,



Christopher A. Canter  
On behalf of Compass Global

## **Compass Global**

### **STATEMENT OF POLICY REGARDING CUSTOMER PROPRIETARY NETWORK INFORMATION**

Set forth below is a statement summarizing the policies and procedures of Compass Global ("Compass Global") which ensure adequate compliance with the Federal Communications Commission's ("FCC") CPNI regulations. See 47 C.F.R. § 64.2001 et seq. Compass Global provides telecommunications services exclusively as a private service provider and wholesale supplier to the prepaid calling services industry.

As a wholesale prepaid services provider, the company does not have access to CPNI. Prepaid services customers do not "subscribe" to the services of Compass Global in the same manner as customers of non-prepaid service providers; rather, these customers decide for themselves if they will use the company's services. These customers do not receive bills from Compass Global. Compass Global does not have information concerning the quantity, technical configuration, type, destination, location, or amount of use of telecommunications services which can be associated with any individual customer. Indeed, because the company's prepaid services may lawfully be utilized by any authorized user of the purchased services, Compass Global has no means of identifying the particular individual which has placed any particular call.

Nevertheless, Compass Global has adopted a confidentiality policy that addresses proper handling, use and storage of CPNI and, furthermore, the company has informed its employees of the company's CPNI compliance policy. Compass Global does not release or distribute CPNI to unauthorized individuals; neither does Compass Global use CPNI in violation of Section 64.200 § et seq. of the FCC's Rules.

To the extent Call Detail Records ("CDRs") exist, they are not associated with any individually identifiable customer and do not constitute CPNI. To the extent that such CDR information exists in paper, removable magnetic or optical form, it is maintained by Compass Global in a secure location which is not accessible by employees of Compass Global without going through the company's established security procedures. When such information is maintained on a computer, the computer and/or the individual file is password protected.

As noted above, Compass Global does not maintain CPNI in any manner which would give rise to the unauthorized disclosure of confidential information. Even in cases dealing with the limited information which is necessary to facilitate customer purchases of prepaid telecommunications services, Compass Global takes steps prior to providing any requested information to assure itself that the individual making the request is authorized to obtain it.

Moreover, any call detail information obtained by Compass Global is not made available to end-user customers or third parties over the telephone, online, or in retail stores. However, such information may be disclosed: (a) in response to a proper subpoena, court order or other judicial process; or (b) to the transmitting or receiving carriers for billing-relating purposes. In the event of unauthorized CPNI access, Compass Global will notify the requisite law enforcement agencies, and the customer when possible.

Compass Global did not have any breach of its call detail records during the past year, nor has the company received any customer complaints in the past year concerning the unauthorized release of or access to CPNI. Because Compass Global does not have any presubscribed customers, and does not know the identity of end-users whose traffic is routed through Compass Global, it cannot notify those end-user customers directly if a breach occurs. However, Compass Global has processes and procedures in place to maintain records of any security breaches and to notify affected carriers and law enforcement of such breaches. Finally, the company has no information, other than publicly reported information regarding the processes that pretexters or data brokers are using to attempt to access CPNI.

**Compass Global**  
**Annual CPNI Certification**  
**47 C.F.R. § 64.2009(e)**  
**EB Docket No. 06-36**

COMPANY NAME: Compass Global  
REPORTING PERIOD: January 1, 2011 - December 31, 2011  
FILER ID: 826216  
OFFICER: Dean Cary  
TITLE: President & CEO

I, Dean Cary, hereby certify that I am an officer of Compass Global ("Compass Global") and that I am authorized to make this certification on behalf of Compass Global. I have personal knowledge that Compass Global has established operating procedures that are adequate to ensure compliance with the Commission's rules governing Customer Proprietary Network Information ("CPNI"), to the extent that such rules apply to Compass Global or to any of the information obtained by Compass Global. See 47 C.F.R. § 64.2001 et seq.

Attached to this certification is an accompanying statement explaining the procedures Compass Global employs to ensure that it complies with the requirements set forth in § 64.2001 et seq. of the Commission's rules, to the extent that such requirements apply to Compass Global or to the information obtained by Compass Global.

Signed:   
On behalf of Compass Global

Date: FEB 15, 2012